

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE NATIONAL PRESCRIPTION OPIATE
LITIGATION

This document relates to:

*“Track One-B Cases”*¹

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

WALMART INC.’S WITNESS LIST

Pursuant to Federal Rule of Civil Procedure 26 and this Court’s Track One-B Civil Jury Trial Order (Dkt. No. 3308), Walmart Inc. lists below and hereby discloses the following witnesses who may testify at trial on its behalf.² Walmart separately joins the Pharmacy Defendants’ Joint Witness List and reserves the right to offer the testimony of the witnesses listed there.

In serving this witness list, Walmart specifically reserves the right to amend, supplement, or otherwise modify these disclosures if new or modified information is provided at any point. Walmart also reserves the right to supplement and/or to amend its lists with any witnesses identified on any party’s witness lists, including Plaintiffs’ lists, as well as any party who later settles or is severed or dismissed. Walmart further reserves the right to conduct a direct examination of any witness called by the Plaintiffs and/or to call additional witnesses not identified on this list that are submitted as part of current or future witness lists by any other party. Walmart reserves the right to supplement and/or to amend this witness list in response to

¹ Track One-B cases are *County of Summit, Ohio et al. v. Purdue Pharma, L.P. et al.*, Case No. 1:18-op-45090 (N.D. Ohio) and *County of Cuyahoga v. Purdue Pharma, L.P. et al.*, Case No. 17-op-45004 (N.D. Ohio).

² Individuals marked with an asterisk are those for whom Walmart previously affirmatively designated deposition testimony.

rulings of the Court on pretrial motions and to call witnesses, either live or by designation, to rebut Plaintiffs' case. Walmart reserves the right to call any witness live at trial, including but not limited to those witnesses for whom Walmart had previously affirmatively designated deposition testimony. Walmart additionally reserves the right to present the deposition testimony of any witness listed herein, where permitted by any applicable rules, orders of the Court, or agreement of the parties.

A. Expert Witnesses

1. Daniel Kessler, Ph.D., Professor of Political Economy, Stanford Graduate School of Business; Professor of Law, Stanford Law School; Professor (by courtesy) of Health Research and Policy, Stanford School of Medicine; Senior Fellow, Hoover Institution and Stanford Institute for Economic Policy Research, Stanford University; Senior Advisor, Cornerstone Research.

Areas of Testimony: Professor Kessler is expected to testify about the subject matter of his expert report.

2. Krista Tongring, Managing Director, Guidepost Solutions.

Areas of Testimony: Ms. Tongring is expected to testify about the subject matter of her expert report.

B. Fact Witnesses

1. Jeff Abernathy,* Walmart Associate.

Areas of Testimony: Mr. Abernathy is expected to testify concerning his duties, responsibilities, and experiences at Distribution Center No. 6045 and as a member of the Pharmacy Order Monitoring team.

2. Greg Beam,* Walmart Associate.

Areas of Testimony: Mr. Beam is expected to testify concerning his duties, responsibilities, and experiences as the Director of Global Investigations, and other roles at Walmart.

3. George Chapman,* Walmart Associate.

Areas of Testimony: Mr. Chapman is expected to testify concerning his duties, responsibilities, and experiences as a Senior Director in Health & Wellness Practice Compliance, and other roles at Walmart.

4. JoLynn Coleman, Walmart Associate.

Areas of Testimony: Ms. Coleman is expected to testify concerning her duties, responsibilities, and experiences as a Senior Buyer in Pharmacy Merchandising.

5. Scott Culver, Walmart Associate.

Areas of Testimony: Mr. Culver is expected to testify concerning his duties, responsibilities, and experiences as a Senior Director in Health & Wellness Distribution, and other roles at Walmart.

6. Chad Ducote,* Walmart Associate.

Areas of Testimony: Mr. Ducote is expected to testify concerning his duties, responsibilities, and experiences as a Senior Director in Health & Wellness Supply Chain.

7. Tim Harris, Walmart Associate.

Areas of Testimony: Mr. Harris is expected to testify concerning his duties, responsibilities, and experiences as a Senior Director in Health & Wellness Distribution, and other roles at Walmart.

8. Susanne Hiland, Walmart Associate.

Areas of Testimony: Ms. Hiland is expected to testify concerning her duties, responsibilities, and experiences as a Senior Director in Health & Wellness Professional Relations & Clinical Quality Assurance, and other roles at Walmart.

9. Miranda Johnson,* Walmart Associate.

Areas of Testimony: Ms. Johnson is expected to testify concerning her duties, responsibilities, and experiences as the Director of Controlled Substances in Health & Wellness Practice Compliance.

10. Patsy Little, Walmart Associate.

Areas of Testimony: Ms. Little is expected to testify concerning her duties, responsibilities, and experiences as a Senior Buyer in Pharmacy Merchandising.

11. Dena McClamroch, Walmart Associate.

Areas of Testimony: Ms. McClamroch is expected to testify concerning her duties, responsibilities, and experiences as a Manager of the Pharmacy Order Monitoring team.

12. Mike Mullin, Walmart Associate

Areas of Testimony: Mr. Mullin is expected to testify concerning his duties, responsibilities, and experiences at Distribution Center No. 6045 and Distribution Center No. 6001.

13. Roxy Reed,* Walmart Associate.

Areas of Testimony: Ms. Reed is expected to testify concerning her duties, responsibilities, and experiences as a Senior Manager in Health & Wellness Practice Compliance, and other roles at Walmart.

14. Kristy Spruell,* Walmart Associate.

Areas of Testimony: Ms. Spruell is expected to testify concerning her duties, responsibilities, and experiences as a Senior Manager in Logistics, and other roles at Walmart.

15. Ramona Sullins,* Walmart Associate.

Areas of Testimony: Ms. Sullins is expected to testify concerning her duties, responsibilities, and experiences as a Senior Manager in Health & Wellness Distribution, and other roles at Walmart.

Dated: September 21, 2020

Respectfully submitted,

/s/ Tara A. Fumerton

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Counsel for Walmart Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Witness List was filed electronically this 21st day of September 2020. Notice of this filing will be sent by operation of the Court's electronic filing system to counsel of record for all parties as indicated on the electronic filing receipt. Parties and their counsel may access this filing through the Court's system.

/s/ Tara A. Fumerton

Tara A. Fumerton

Counsel for Walmart Inc.